Michael J. Wernke mjwernke@pomlaw.com

600 Third Avenue New York, New York 10016 T: 212.661.1100 F: 212.661.8665

March 14, 2016

VIA ECF

Hon. Jesse M. Furman United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: Koopman v. Fiat Chrysler Automobiles N.V. et al., 1:15-cv-07199-JMF (S.D.N.Y.)

Your Honor:

We write on behalf of Lead Plaintiffs Gary Koopman and Timothy Kidd ("Lead Plaintiffs") in response to the Court's order of March 8, 2016 (ECF No. 34) (the "Order") to inform the Court that Lead Plaintiffs believe that there are amendments to the First Amended Complaint (ECF No. 28) that will address deficiencies that Defendants allege in their motion to dismiss. ECF No. 31. Pursuant to the Court's Order, Lead Plaintiffs will file the second amended complaint no later than March 29, 2016.

Respectfully submitted,

/s/ Michael J. Wernke

Michael J. Wernke

cc: Counsel of record (by ECF)